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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE

KWIK KAR OF COLLEYVILLE, LLC

DEBTOR

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Case no. 10-45796-RFN-11

CHAPTER 11

EMERGENCY MOTION FOR AUTHORITY TO USE OF CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Kwik Kar of Colleyville, LLC (“Debtor”) and moves the Court under 11 U.S.C. §363 for Emergency Approval of Interim Use of Cash Collateral and would show the Court the following:

1. The Debtor filed a voluntary Chapter 11 Petition on September 3, 2010.
2. The Debtor must have cash to make payroll and to pay other immediate expenses to keep its doors open.
3. The Debtors business consists of the ownership and operation of a oil change store.
4. Bank of America currently asserts a first lien position, on among other things the

inventory, equipment and accounts receivable of Debtor (“Collateral”). This Collateral may constitute the cash collateral of Bank of America as that term is defined in the Bankruptcy Code.

5. The Debtor is in immediately need to use the cash collateral of Bank of America to maintain operations of the business. The continued operations of the Debtor will necessitate the use of the cash collateral.

6. The Debtor seeks to use the cash collateral of Bank of America to make the payroll and continue operations. Debtor seeks interim use of the cash collateral for the uses set forth on Exhibit “A”.

7. An emergency exists in that the entire chance of the Debtor’s reorganizing depends on the Debtors ability to immediately obtain use the alleged collateral of Bank of America to continue operations of the companies while effectuating a plan of reorganization.

8. The Debtor is willing to provide Bank of America with replacement liens pursuant to 11U.S.C. section 552.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Emergency Hearing and that upon hearing, this Court enter and Order authorizing the Debtor’s use of the Cash Collateral of Bank of America in the amounts set forth in Exhibit “A” and to grant Bank of America, adequate protection in the form of replacement liens under 11 U.S.C. section 552, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via telecopy or mail to the Eric Zukoski, attorney of record for Bank of America and the United States Trustee on this the 6th day of September, 2010.

/s/ Eric Liepins
Eric A. Liepins

15 day budget for Kwik Kar

Revenue	40,000
Expenses	
Payroll	12,000
Payroll taxes	667
Sales Tax	1,800
Utilities	1,300
Supplies	850
Uniforms	315
Maintenance	1,850
Bookkeeper	500
Inventory	14,800
Total	34,082